IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

WILLIAM CLARK,	:	
	:	
Plaintiff,	:	
	:	Civil No. 01-0764
	:	
v.	:	(Judge William W. Caldwell)
	:	
LARRY LIDGETT, et al.,	:	JURY TRIAL DEMANDED
	:	
Defendants.	:	

FILED
HARRISBURG, PA
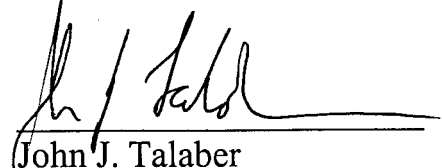DEC 0 4 2002
MARY E. [signature]
Per _____

CORRECTIONS DEFENDANTS' MOTION
FOR SUMMARY JUDGMENT

The Corrections Defendants, Martin Horn, Robert Meyers, and Larry

Lidgett, by and through their attorney, John J. Talaber, Assistant Counsel for the

Pennsylvania Department of Corrections, respectfully move this Honorable Court

to grant them summary judgment pursuant to Fed.R.Civ.P. 56 as there are no

genuine issues of material fact in dispute and they are entitled to judgment as a

matter of law. Further, through this Motion, the Corrections Defendants seek

dismissal of Plaintiff's Complaint with prejudice based on their qualified immunity

to his claims.

WHEREFORE, for the reasons stated within the Correction Defendants'

supporting brief to the Motion for Summary Judgment, they respectfully request

that Complaint against them be dismissed with prejudice.

Respectfully submitted,
Office of General Counsel

BY: _____

John J. Talaber
Assistant Counsel
Pa. Department of Corrections
55 Utley Drive
Camp Hill, PA 17011
(717) 731-0444

Dated: December 4, 2002

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FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

WILLIAM CLARK,   :

      Plaintiff,   :

                          :   Civil No. 01-0764

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      v.   :   (Judge William W. Caldwell)

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LARRY LIDGETT, et al.,   :

                          :   JURY TRIAL DEMANDED

      Defendants.   :

PROOF OF SERVICE

The undersigned hereby certifies that the Corrections Defendants' Motion for

Summary Judgment was served upon the person(s) in the manner indicated below.

Service by first-class mail
addressed as follows:

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Dated: December 4, 2002